



To: Federal Communications Commission
Re: Docket No. 18-353

Imagine Networks is a small Wireless Internet Service Provider (WISP) in south west Ohio, north of the Dayton area. After being founded in 2006 we have always pushed to offer customers lower cost services than what is otherwise available. For nearly all of our customers, there are no other financially reasonable Internet service options. To this day we still offer a very cost effective plan at 2 mbps for those that do not need multimedia but rather need to communicate through the Internet and are able to provide 20 mbps at many of our tower sites. The majority of customers opt for our 4 mbps service while some are going with 10 mbps. The biggest relief, though, is the truly unlimited data plans.

The options we have to be able to be cost effective are unlicensed or "lightly licensed". 900 MHz was ruined for us years ago due to the high noise floor. 2.4 GHz has been increasingly harder year after year, again due to the rising noise floor. 5 GHz has been our primary focus to deliver service to customers. This band has little to no NLOS capability. We turn down customers every week due to obstructions, most often trees in our rural area. Our only other option is LTE in the 3.65 GHz range. We began experimenting with this and have had some success. The customers on this LTE equipment would not have service through us, or anyone else for that matter, if we had no been able to use 3.65. If we are not able to use this band cost effectively, we will lose these customers and they will lose Internet access entirely.

The need to change equipment out would be monumental for a company our size. We still deal with the day to day issues of maintaining the equipment and service before having to replace everything with new hardware. The cost is another massive feat we had not budgeted for, though we are hopeful it is a software change. The customers would be impacted with a loss of service as it would take us quite some time (days, weeks) to get everyone re-installed. At this point we've had to halt any new customers due to what we don't know will happen to them. There are customers we could service today if we knew they would be able to stay with us through the transition to CBRS. We are not in a position to buy equipment for future customers that may end up needing replaced in a little over a year! There are so many unknowns to deal with:

1. Current equipment may or may not fit Part 96 rules. It currently supports Part 90 rules.
2. SAS operation is totally unknown to us. There are no operational databases or services.
3. The requirement of a "Certified Professional Installer" is an unknown cost with an unknown ruleset date.

When we began using our NN license 10 years ago, we had planned to do several point to point links due to 5 GHz congestion between towers and towers to customers. Our sites are only a few miles from one another and we still struggle to find clean spectrum, even with the outdoor inclusion of the 5.1 GHz range, of which we greatly appreciate and desperately needed.

Imagine Networks supports the extension of the transition deadline as requested in the Petition filed October 4, 2018 by WISPA and UTC.